

EXHIBIT A

Document title:	Photo Gallery: Reflection of Time
Capture URL:	https://www.flavorwire.com/164201/photo-gallery-reflection-of-time
Captured site IP:	151.101.250.217
Page loaded at (UTC):	Fri, 24 Apr 2020 15:37:30 GMT
Capture timestamp (UTC):	Fri, 24 Apr 2020 15:39:02 GMT
Capture tool:	v6.13.15
Collection server IP:	52.5.8.50
Browser engine:	Chrome/70.0.3538.77
Operating system:	Microsoft Windows NT 10.0.14393.0 (10.0.14393.0)
PDF length:	8
Capture ID:	e103c8e2-b7aa-4384-b233-c840d5e85842
User:	msk-general

FLAVORWIRE

Photo Gallery: Reflection of Time

By Caroline Stanley | March 23, 2011

Share:



For his series *Mirrors*, Dallas-based photographer [Tom Hussey](#) paired images of elderly subjects with reflections of the “younger versions” of themselves. The results were so impressive that they were used in an award-winning ad campaign for an Alzheimer’s drug.

“I was talking with a World War II veteran, Gardner, about his life experiences,” says Hussey, [explaining](#) the genesis of the project. “He was about to have his 80th birthday. He commented that he didn’t understand how he could be 80 years old as he felt he was still a young man. He just didn’t feel it was possible he could be 80 years old. I started thinking about a milestone age approaching for me, as I was nearing 40. I realized that everyone thinks of themselves at a certain age or time in life. I built a bathroom set and photographed Gardner staring into his bathroom mirror and seeing himself as a 25-year-old young man.” Click through to check out a gallery of images.

certain age or time in life. I built a bathroom set and photographed Gardner staring into his bathroom mirror and seeing himself as a 25-year-old young man.” Click through to check out a gallery of images.

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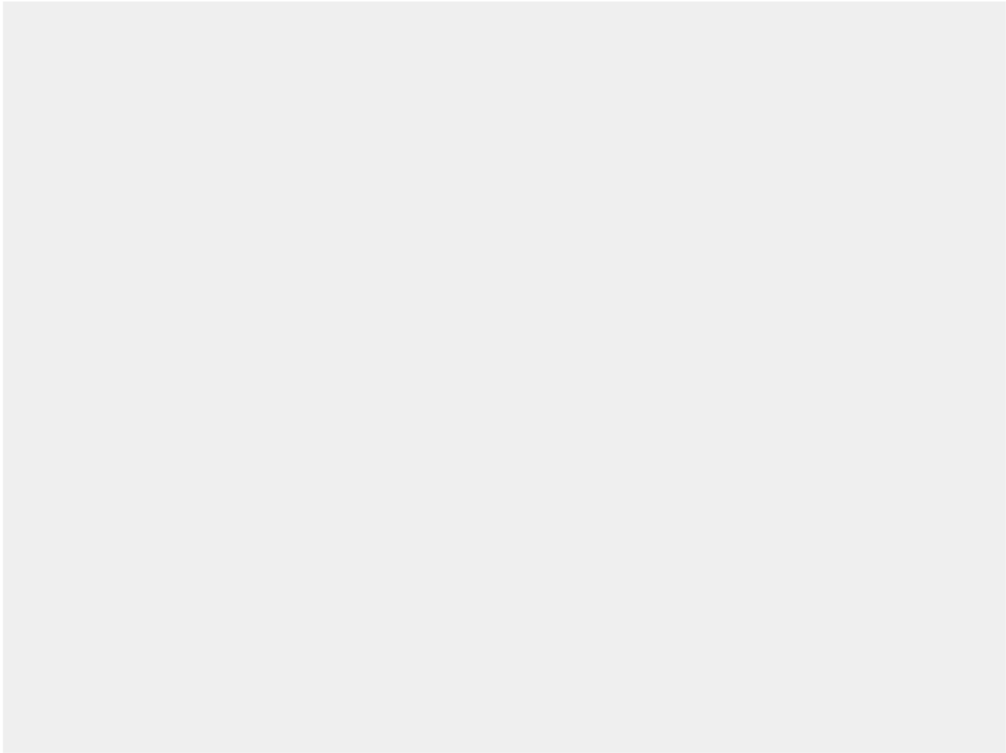
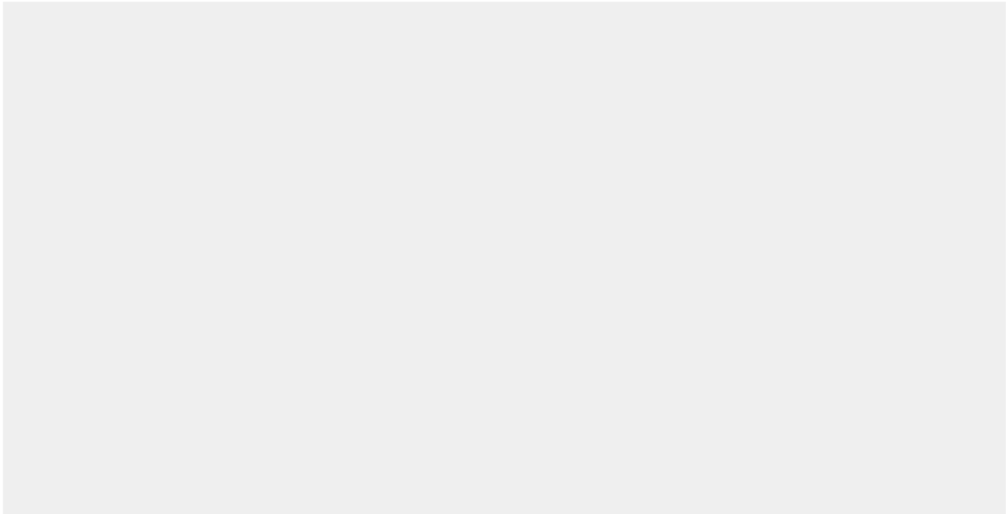


Photo credit: [Tom Hussey](#)



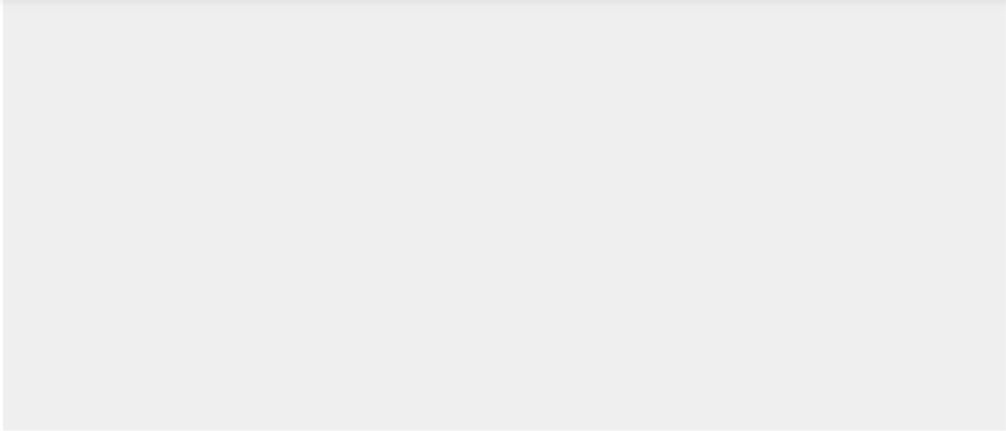


Photo credit: [Tom Hussey](#)

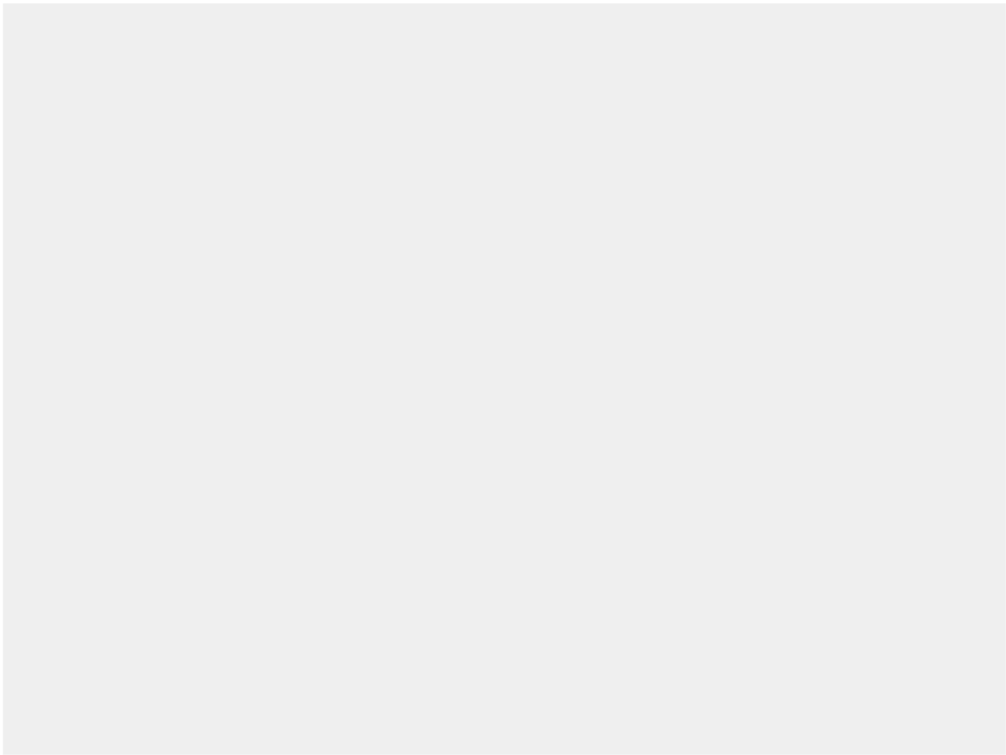
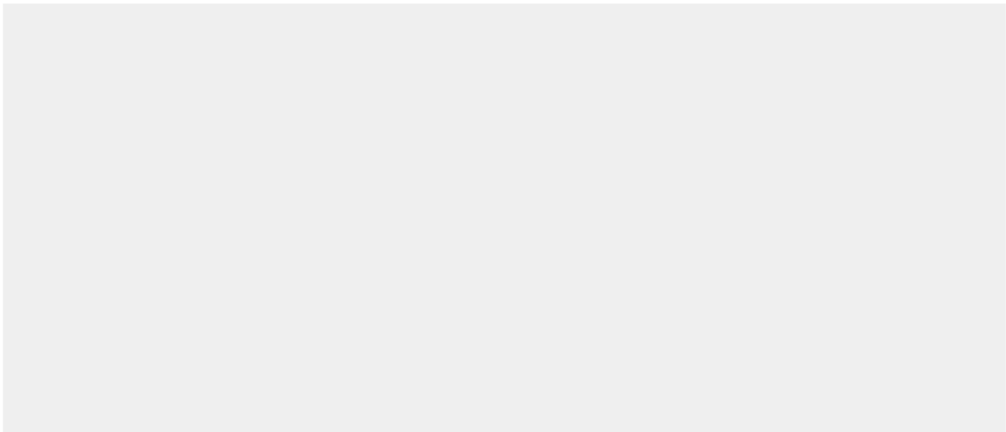


Photo credit: [Tom Hussey](#)



Forehead Thermometer



\$69.95

PRO-THERMS

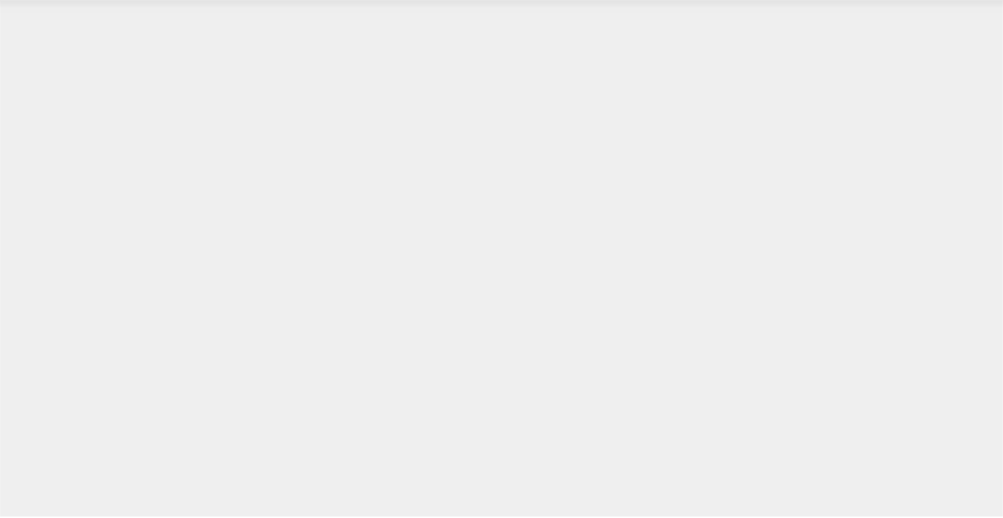


Photo credit: [Tom Hussey](#)

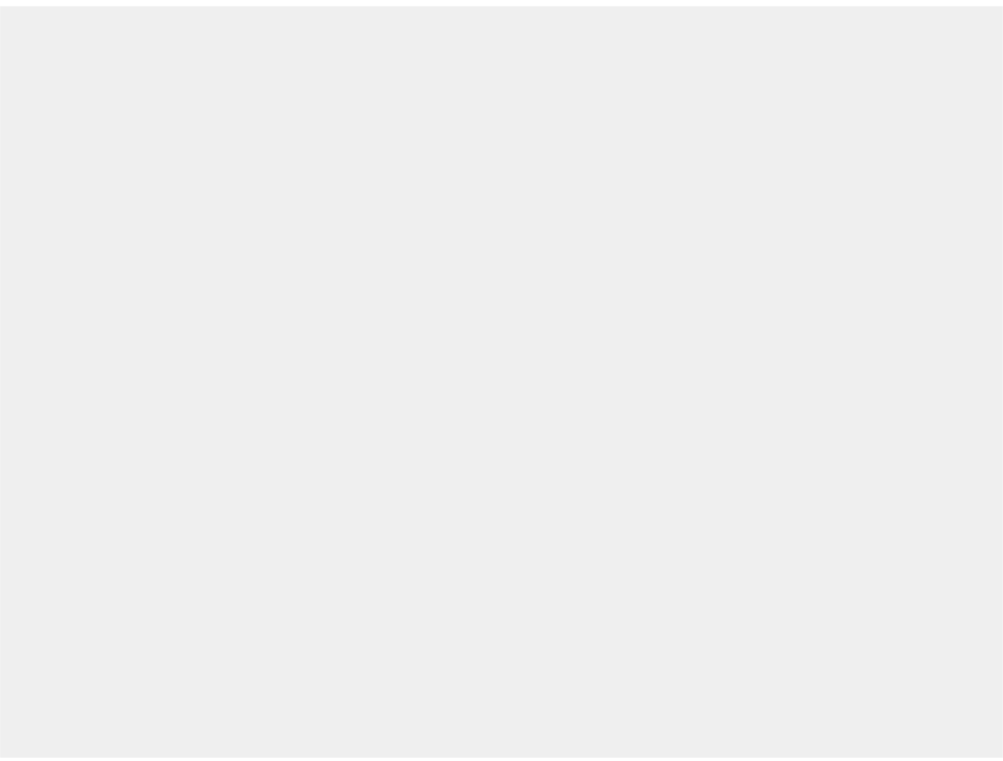
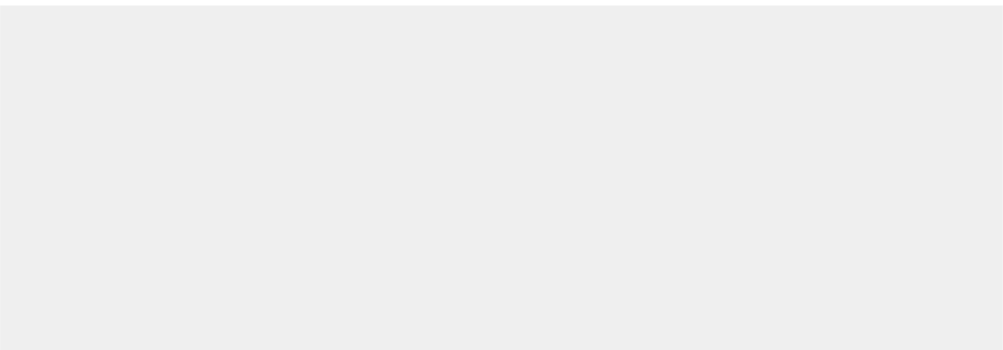


Photo credit: [Tom Hussey](#)





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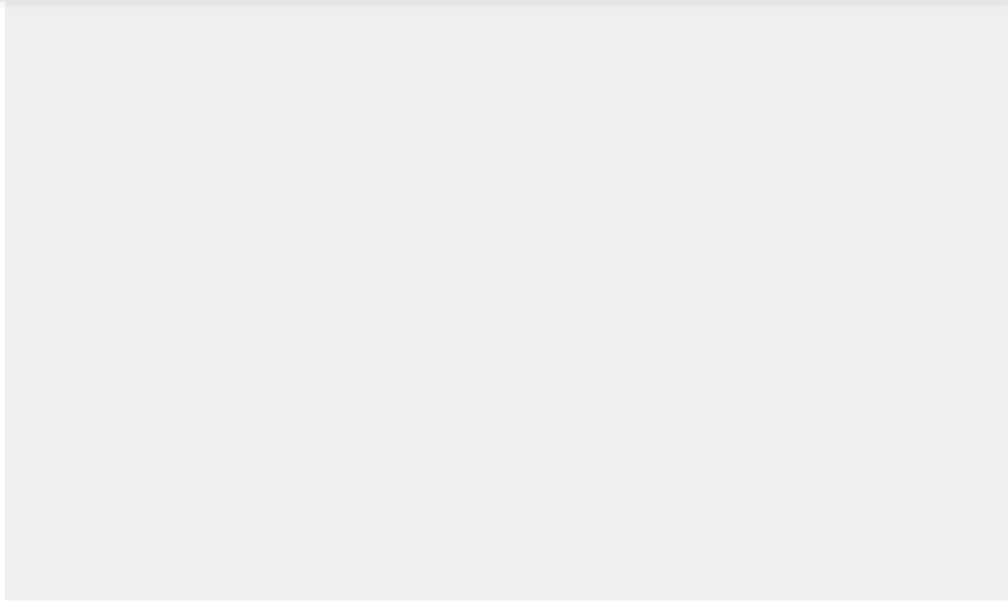


Photo credit: [Tom Hussey](#)

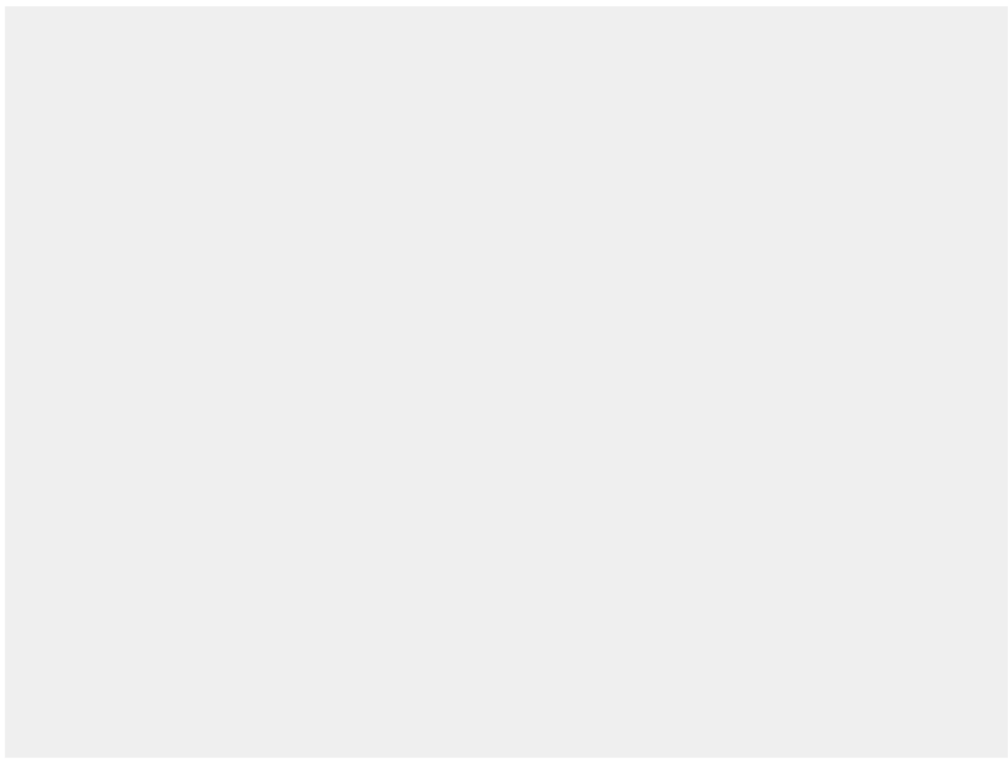


Photo credit: [Tom Hussey](#)

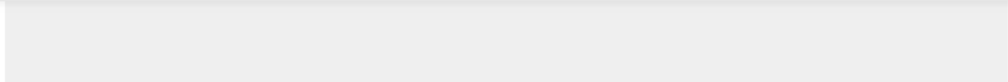


Photo credit: [Tom Hussey](#)

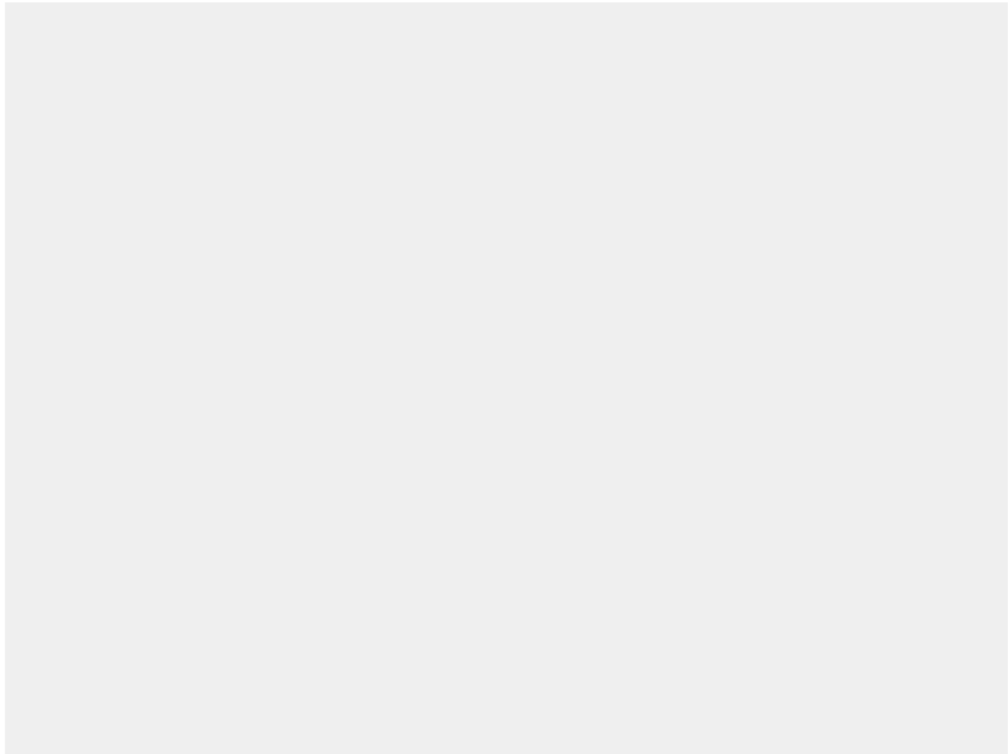
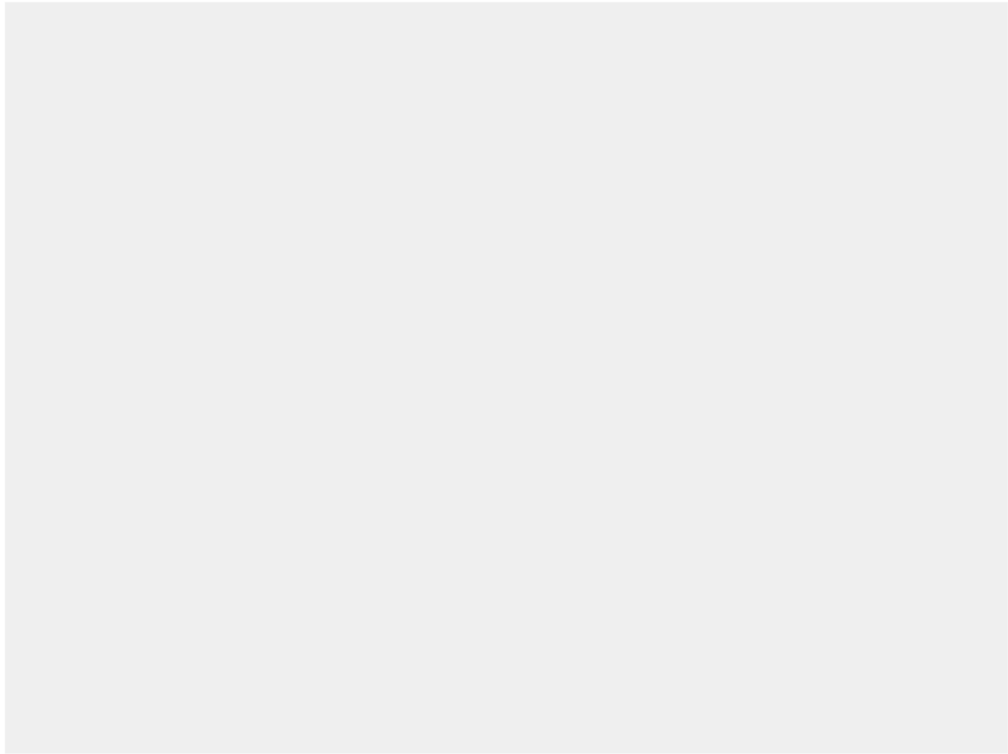


Photo credit: [Tom Hussey](#)



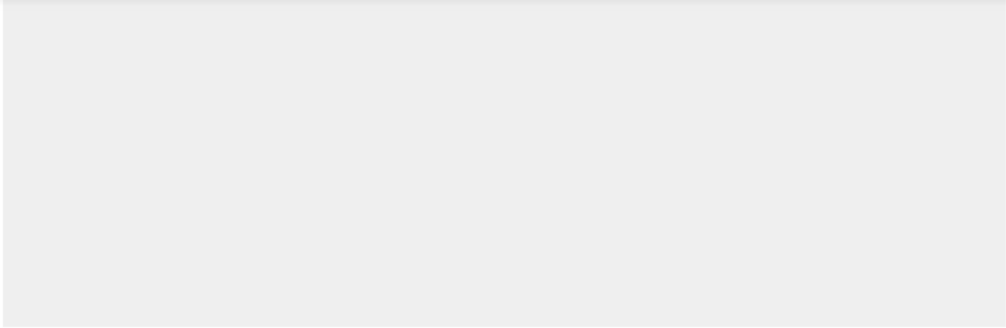


Photo credit: [Tom Hussey](#)

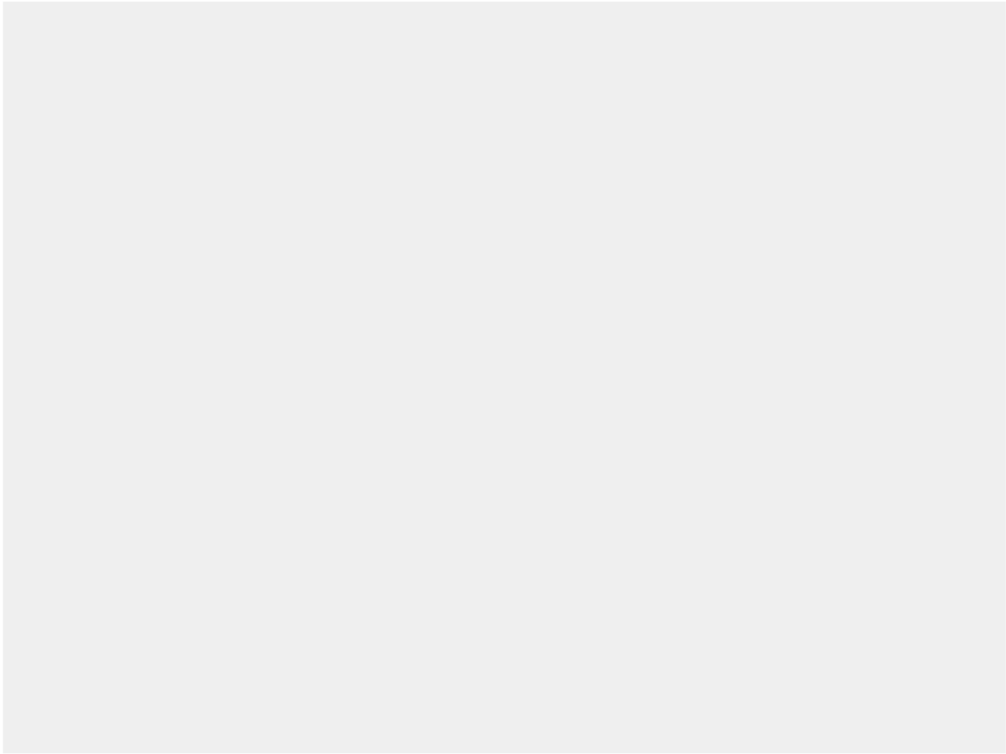


Photo credit: [Tom Hussey](#)

IN STOCK



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EXHIBIT B



Department of State: Division of Corporations

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Entity Details

THIS IS NOT A STATEMENT OF GOOD STANDING

File Number:	5280631	Incorporation Date / Formation Date:	1/28/2013 (mm/dd/yyyy)
Entity Name:	BDG MEDIA, INC.		
Entity Kind:	Corporation	Entity Type:	General
Residency:	Domestic	State:	DELAWARE

[REGISTERED AGENT INFORMATION](#)

Name:	CORPORATION SERVICE COMPANY		
Address:	251 LITTLE FALLS DRIVE		
City:	WILMINGTON	County:	New Castle
State:	DE	Postal Code:	19808
Phone:	302-636-5401		

Additional Information is available for a fee. You can retrieve Status for a fee of \$10.00 or more detailed information including current franchise tax assessment, current filing history and more for a fee of \$20.00.

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EXHIBIT C



Franchise Tax Account Status

As of : 04/23/2020 20:09:14

This page is valid for most business transactions but is not sufficient for filings with the Secretary of State

TOM HUSSEY PHOTOGRAPHY, LLC	
Texas Taxpayer Number	32034049166
Mailing Address	154 EXPRESS ST DALLAS, TX 75207-6706
ⓘ Right to Transact Business in Texas	ACTIVE
State of Formation	TX
Effective SOS Registration Date	10/30/2007
Texas SOS File Number	0800891354
Registered Agent Name	THOMAS ANDREW HUSSEY
Registered Office Street Address	154 EXPRESS STREET DALLAS, TX 75207

EXHIBIT D



Party Search Results

Search Criteria: Party Search; Last Name: [hussey]; First Name: [tom]; Party Role: [PLA]; Sort: [Date Filed, Ascending]

Result Count: 13 (1 page)

Current Page: 1

Party Name	HUSSEY, TOM (pla)
Case Number	1:2016cv00019
Case Title	HUSSEY V. COLLEGEVOX LLC, D/B/A GAINESVILLESCENE AND ORLANDOSCENE
Court	Florida Northern District Court
Date Filed	01/29/2016
Date Closed	04/12/2016
Party Name	Hussey, Tom (pla)
Case Number	1:2016cv03767
Case Title	Hussey v. Sensitive Touch, Inc.
Court	New York Southern District Court
Date Filed	05/19/2016
Date Closed	10/17/2017
Party Name	Hussey, Tom (pla)
Case Number	1:2017cv00445
Case Title	Hussey v. McCleary
Court	Colorado District Court
Date Filed	02/17/2017
Date Closed	07/03/2018
Party Name	Hussey, Tom (pla)
Case Number	1:2017cv07711
Case Title	Hussey v. Devgan et al
Court	New York Southern District Court
Date Filed	10/09/2017
Date Closed	04/03/2018
Party Name	Hussey, Tom (pla)
Case Number	2:2018cv10316
Case Title	Hussey v. Glenn R. Matecun, P.C.
Court	Michigan Eastern District Court
Date Filed	01/26/2018
Date Closed	05/09/2018
Party Name	Hussey, Tom (pla)
Case Number	2:2018cv01253
Case Title	Hussey v. Alan Jeskey Builders, Inc.
Court	Nevada District Court
Date Filed	07/09/2018
Date Closed	10/17/2018

Party Name	Hussey, Tom (pla)
Case Number	2:2018cv06928
Case Title	Tom Hussey v. Unlimited Trading Company, Inc. et al
Court	California Central District Court
Date Filed	08/13/2018
Date Closed	10/02/2018

Party Name	Hussey, Tom (pla)
Case Number	2:2018cv07084
Case Title	Tom Hussey v. Chancellor Health Care, LLC et al
Court	California Central District Court
Date Filed	08/15/2018
Date Closed	12/21/2018

Party Name	Hussey, Tom (pla)
Case Number	1:2018cv24059
Case Title	Hussey v. Ngo
Court	Florida Southern District Court
Date Filed	10/02/2018
Date Closed	03/21/2019

Party Name	Hussey, Tom (pla)
Case Number	3:2018cv02299
Case Title	Tom Hussey v. Unlimited Trading Company, Inc. et al
Court	California Southern District Court
Date Filed	10/03/2018
Date Closed	06/21/2019

Party Name	HUSSEY, TOM (pla)
Case Number	7:2019cv00044
Case Title	TOM HUSSEY v. DATA SOFTWARE SERVICES LLC
Court	Georgia Middle District Court
Date Filed	03/18/2019
Date Closed	08/26/2019

Party Name	Hussey, Tom (pla)
Case Number	1:2019cv23461
Case Title	Hussey v. Positivemed, LLC
Court	Florida Southern District Court
Date Filed	08/19/2019
Date Closed	10/31/2019

Party Name	Hussey, Tom (pla)
Case Number	2:2020cv00721
Case Title	Tom Hussey v. Style Pantry, LLC et al
Court	California Central District Court
Date Filed	01/23/2020
Date Closed	



Billable Pages

1 (\$0.10)

EXHIBIT E



Party Search Results

Search Criteria: Party Search; Last Name: [hussey]; First Name: [thomas]; Party Role: [PLA]

Result Count: 7 (1 page)

Current Page: 1

Party Name	Hussey, Thomas (pla)
Case Number	3:2006cv05381
Case Title	Hussey et al v. General Electric Company et al
Court	California Northern District Court
Date Filed	08/31/2006
Date Closed	01/10/2007
Party Name	Hussey, Thomas (pla)
Case Number	3:2017cv01050
Case Title	Hussey v. Station Pride, LLC
Court	Connecticut District Court
Date Filed	06/26/2017
Date Closed	11/01/2017
Party Name	Hussey, Thomas (pla)
Case Number	3:2017cv01217
Case Title	Hussey v. Source Marketing LLC
Court	Connecticut District Court
Date Filed	07/21/2017
Date Closed	01/03/2018
Party Name	Hussey, Thomas (pla)
Case Number	2:2018cv04268
Case Title	Hussey v. Knockout Media, Inc. et. al.
Court	New York Eastern District Court
Date Filed	07/27/2018
Date Closed	08/27/2018
Party Name	Hussey, Thomas (pla)
Case Number	1:2018cv07893
Case Title	Hussey v. Knockout Industries, LLC et al
Court	New York Southern District Court
Date Filed	08/29/2018
Date Closed	06/05/2019
Party Name	Hussey, Thomas (pla)
Case Number	1:2019cv03804
Case Title	Hussey v. PSFK, LLC
Court	New York Southern District Court
Date Filed	04/29/2019
Date Closed	08/20/2019

Party Name	Hussey, Thomas Andrew (pla)
Case Number	1:2018cv11714
Case Title	Hussey v. Kaizen Media Group LLC et al
Court	New York Southern District Court
Date Filed	12/14/2018
Date Closed	05/08/2019

PACER Service Center**Receipt** 04/28/2020 14:51:28 934088229

User	[REDACTED]
Client Code	[REDACTED]
Description	All Court Types Party Search All Courts; Name hussey, thomas; Role pla; All Courts; Page: 1
Billable Pages	1 (\$0.10)

EXHIBIT F



Party Search Results

Search Criteria: Party Search; Last Name: [tom hussey photography]; Sort: [Date Filed, Ascending]

Result Count: 6 (1 page)

Current Page: 1

Party Name	Tom Hussey Photography, LLC (pla)
Case Number	1:2016cv03767
Case Title	Hussey v. Sensitive Touch, Inc.
Court	New York Southern District Court
Date Filed	05/19/2016
Date Closed	10/17/2017
Party Name	Tom Hussey Photography, LLC (pla)
Case Number	1:2018cv03781
Case Title	Tom Hussey Photography, LLC v. Villa Homemaker & Companions, LLC
Court	New York Southern District Court
Date Filed	04/27/2018
Date Closed	06/05/2018
Party Name	Tom Hussey Photography, LLC (pla)
Case Number	1:2018cv03788
Case Title	Tom Hussey Photography, LLC v. Footprints to Fitness, LLC
Court	New York Southern District Court
Date Filed	04/28/2018
Date Closed	03/01/2019
Party Name	Tom Hussey Photography, LLC (pla)
Case Number	1:2018cv03751
Case Title	Tom Hussey Photography, LLC v. Cool Mom Picks LLC
Court	Georgia Northern District Court
Date Filed	08/06/2018
Date Closed	01/28/2019
Party Name	TOM HUSSEY PHOTOGRAPHY, LLC (pla)
Case Number	1:2019cv03030
Case Title	TOM HUSSEY PHOTOGRAPHY, LLC v. WALKER'S LEGACY
Court	District Of Columbia District Court
Date Filed	10/10/2019
Date Closed	03/23/2020
Party Name	Tom Hussey Photography, LLC (pla)
Case Number	1:2020cv00404
Case Title	Tom Hussey Photography, LLC v. BDG Media, Inc.
Court	Delaware District Court
Date Filed	03/20/2020
Date Closed	

Description	All Court Types; Party Search; Case 1:21-cv-02514-AT-JLC Document 11-1
	All Courts; Name tom hussey photography; All Courts; Page: 1; sort: DateFiled, ASC
Billable Pages	1 (\$0.10)

EXHIBIT G

1 Stephen M. Doniger (SBN 179314)
stephen@donigerlawfirm.com
2 Scott A. Burroughs (SBN 235718)
scott@donigerlawfirm.com
3 Frank Gregory Casella (SBN 301494)
fcasella@donigerlawfirm.com
4 DONIGER/BURROUGHS
5 603 Rose Avenue
6 Venice California 90291
7 Telephone: (310) 590-1820

8 Attorneys for Plaintiff

9
10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**

12 TOM HUSSEY, an individual,

13 Plaintiff,

14 v.

15
16 STYLE PANTRY, LLC, a California
17 Limited Liability Company; and DOES 1
18 through 10,

19 Defendants.

Case No.:

PLAINTIFF'S COMPLAINT FOR
COPYRIGHT INFRINGEMENT

Jury Trial Demanded

20 TOM HUSSEY, by and through his undersigned attorneys, hereby prays to this
21 honorable Court for relief based on the following:

22 **JURISDICTION AND VENUE**

23 1. This action arises under the Copyright Act of 1976, Title 17 U.S.C., § 101
24 *et seq.*

25 2. This Court has federal question jurisdiction under 28 U.S.C. § 1331 and
26 1338 (a) and (b).
27

PARTIES

7. Plaintiff is informed and believes and thereon alleges that at all times relevant hereto each of the Defendants was the agent, affiliate, officer, director, manager, principal, alter-ego, and/or employee of the remaining Defendants and was at all times acting within the scope of such agency, affiliation, alter-ego relationship and/or employment; and actively participated in or subsequently ratified and/or adopted each of the acts or conduct alleged, with full knowledge of all the facts and circumstances, including, but not limited to, full knowledge of each violation of Plaintiff's rights and the damages to Plaintiff proximately caused thereby.

CLAIMS RELATED TO SUBJECT PHOTOGRAPH A

8. HUSSEY owns an original photograph entitled “N-46-Graduate-2” (“Subject Photograph A”) that was registered with the United States Copyright Office on June 8, 2009 with the Registration Number VAu 990-319. Plaintiff is the sole owner of the exclusive rights in Subject Photograph A.

9. Following Plaintiff’s publication and display of Subject Photograph A, STYLE PANTRY, DOE Defendants, and each of them used Subject Photograph A without Plaintiff’s authorization for commercial purposes in various ways, including, but not limited to, the use on websites such as <http://www.stylepantry.com>.

10. An image of Subject Photograph A and a screen capture of Defendant’s website with Subject Photograph A embedded are set forth hereinbelow:

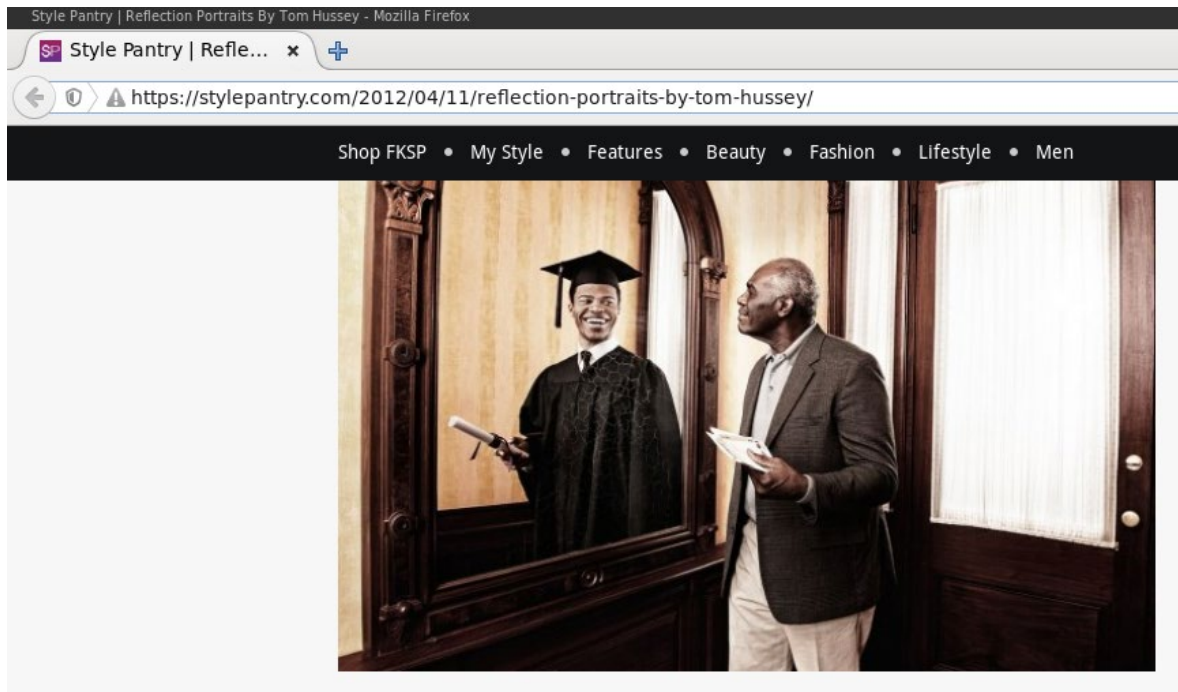
Subject Photograph A



//

//

Screen Capture



CLAIMS RELATED TO SUBJECT PHOTOGRAPH B

11. HUSSEY owns an original photograph entitled “N-46-Korean-Teacher” (“Subject Photograph B”) that was registered with the United States Copyright Office on June 8, 2009 with the Registration Number VAu 990-319. Plaintiff is the sole owner of the exclusive rights in Subject Photograph B.

12. Following Plaintiff’s publication and display of Subject Photograph B, STYLE PANTRY, DOE Defendants, and each of them used Subject Photograph B without Plaintiff’s authorization for commercial purposes in various ways, including, but not limited to, the use on websites such as <http://www.stylepantry.com>.

13. An image of Subject Photograph B and a screen capture of Defendant’s website with Subject Photograph B embedded are set forth hereinbelow:

//

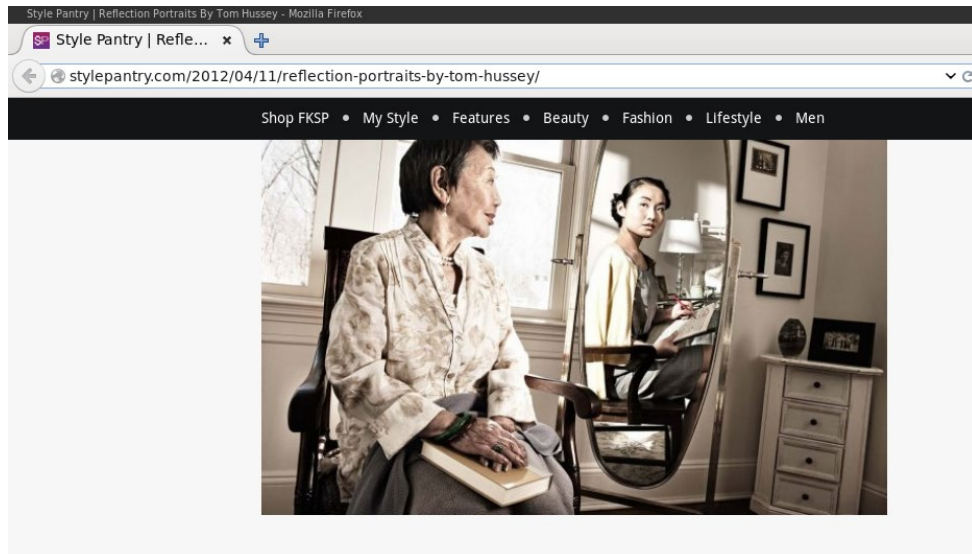
//

//

Subject Photograph B



Screen Capture



CLAIMS RELATED TO SUBJECT PHOTOGRAPH C

14.HUSSEY owns an original photograph entitled “N-46-Soldier-Crop” (“Subject Photograph C”) that was registered with the United States Copyright Office on June 8, 2009 with the Registration Number VAu 990-319. Plaintiff is the sole owner of the exclusive rights in Subject Photograph C.

15. Following Plaintiff’s publication and display of Subject Photograph C, STYLE PANTRY, DOE Defendants, and each of them used Subject Photograph C

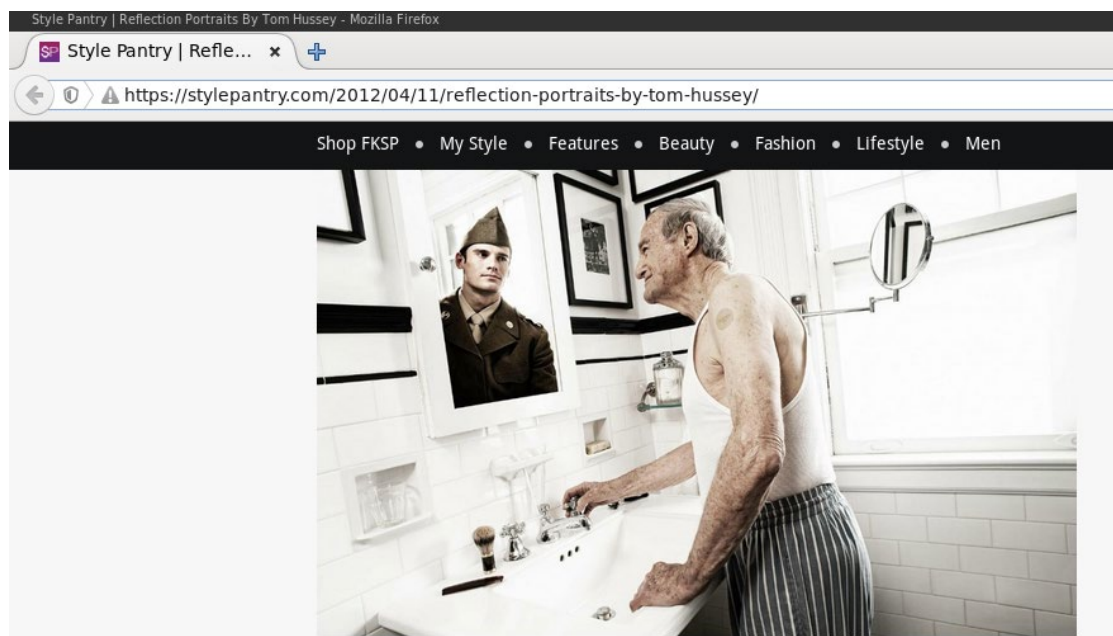
1 without Plaintiff's authorization for commercial purposes in various ways, including,
2 but not limited to, the use on websites such as <http://www.stylepantry.com>.

3 16. An image of Subject Photograph C and a screen capture of Defendant's
4 website with Subject Photograph C embedded are set forth hereinbelow:

5 **Subject Photograph C**



17 **Screen Capture**



CLAIMS RELATED TO SUBJECT PHOTOGRAPH D

17.HUSSEY owns an original photograph entitled “N-46-Teacher-4” (“Subject Photograph D”) that was registered with the United States Copyright Office on June 8, 2009 with the Registration Number VAu 990-319. Plaintiff is the sole owner of the exclusive rights in Subject Photograph D.

18. Following Plaintiff’s publication and display of Subject Photograph D, STYLE PANTRY, DOE Defendants, and each of them used Subject Photograph D without Plaintiff’s authorization for commercial purposes in various ways, including, but not limited to, the use on websites such as <http://www.stylepantry.com>.

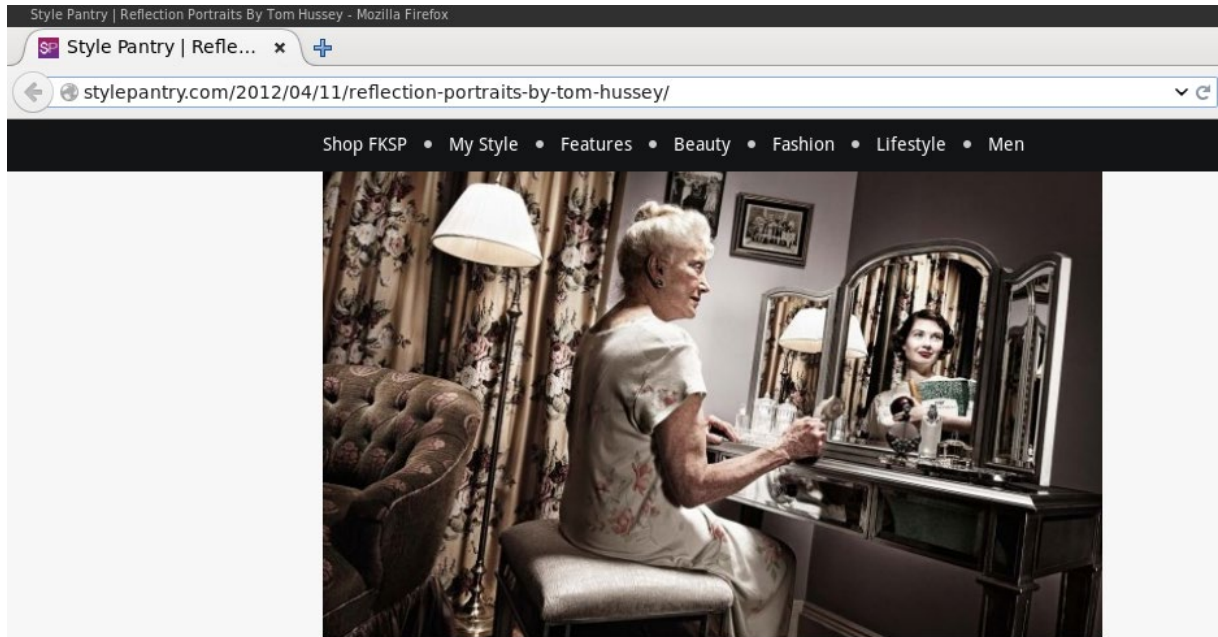
19. An image of Subject Photograph D and a screen capture of Defendant’s website with Subject Photograph D embedded are set forth hereinbelow:

Subject Photograph D



//

Screen Capture



CLAIMS RELATED TO SUBJECT PHOTOGRAPH E

20. HUSSEY owns an original photograph entitled “N-56-0114-Singer-Caregiver” (“Subject Photograph E”) that was registered with the United States Copyright Office on June 8, 2009 with the Registration Number VAu 990-319. Plaintiff is the sole owner of the exclusive rights in Subject Photograph E.

21. Following Plaintiff’s publication and display of Subject Photograph E, STYLE PANTRY, DOE Defendants, and each of them used Subject Photograph E without Plaintiff’s authorization for commercial purposes in various ways, including, but not limited to, the use on websites such as <http://www.stylepantry.com>.

22. An image of Subject Photograph E and a screen capture of Defendant’s website with Subject Photograph E embedded are set forth hereinbelow:

//

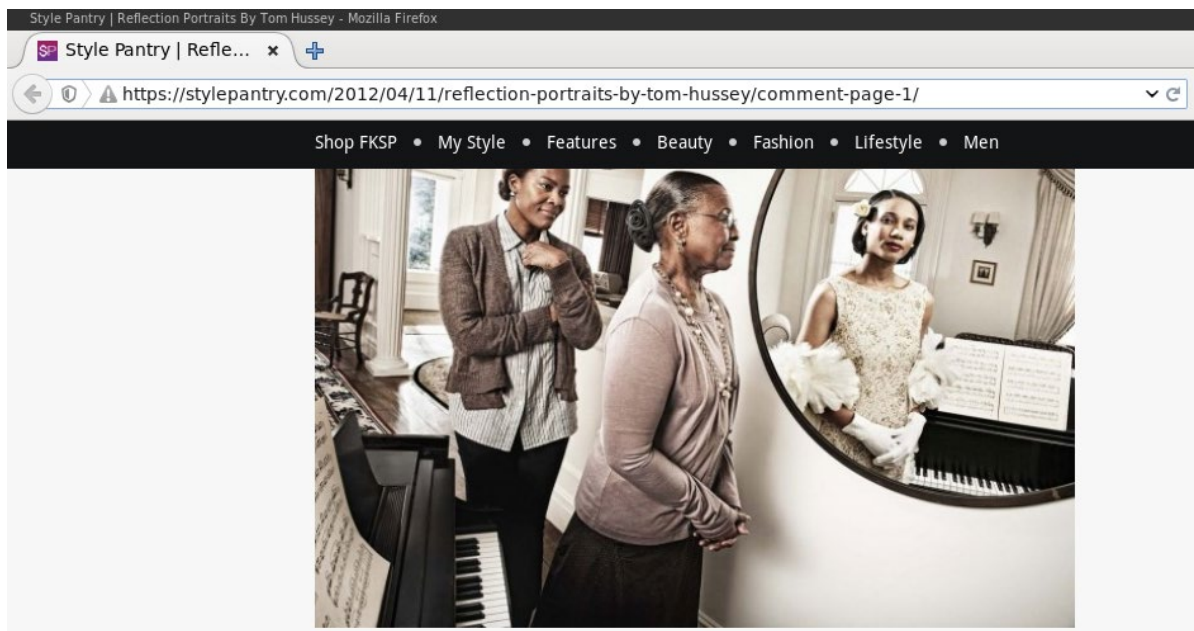
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Subject Photograph E



Screen Capture



CLAIMS RELATED TO SUBJECT PHOTOGRAPH F

23.HUSSEY owns an original photograph entitled “N-46-Welder-4” (“Subject Photograph F”) that was registered with the United States Copyright Office on June

8, 2009 with the Registration Number VAu 990-319. Plaintiff is the sole owner of the exclusive rights in Subject Photograph F.

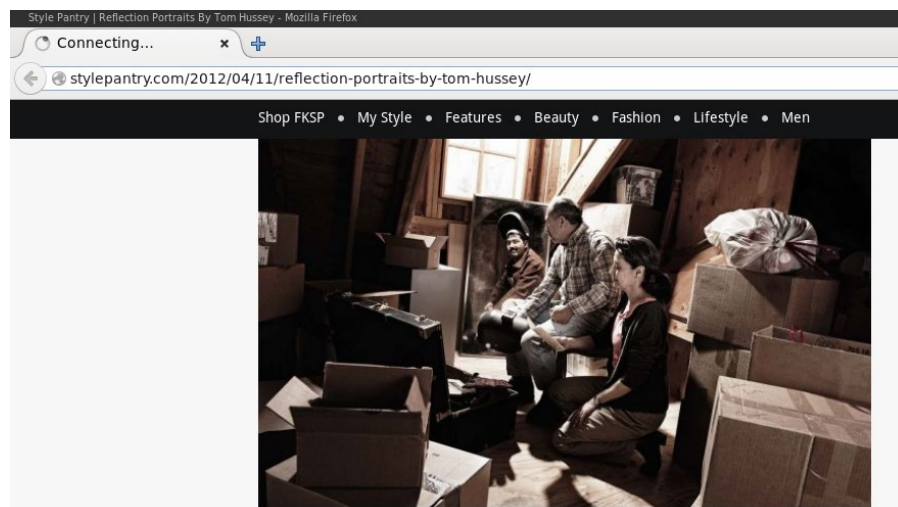
24. Following Plaintiff's publication and display of Subject Photograph F, STYLE PANTRY, DOE Defendants, and each of them used Subject Photograph F without Plaintiff's authorization for commercial purposes in various ways, including, but not limited to, the use on websites such as <http://www.stylepantry.com>.

25. An image of Subject Photograph F and a screen capture of Defendant's website with Subject Photograph F embedded are set forth hereinbelow:

Subject Photograph F



Screen Capture



CLAIMS RELATED TO SUBJECT PHOTOGRAPH G

26. HUSSEY owns an original photograph entitled “N-46-Fireman-Caregiver-2” (“Subject Photograph G”) that was registered with the United States Copyright Office on June 8, 2009 with the Registration Number V Au 990-319. Plaintiff is the sole owner of the exclusive rights in Subject Photograph G.

27. Following Plaintiff’s publication and display of Subject Photograph G, STYLE PANTRY, DOE Defendants, and each of them used Subject Photograph G without Plaintiff’s authorization for commercial purposes in various ways, including, but not limited to, the use on websites such as <http://www.stylepantry.com>.

28. An image of Subject Photograph G and a screen capture of Defendant’s website with Subject Photograph G embedded are set forth hereinbelow:

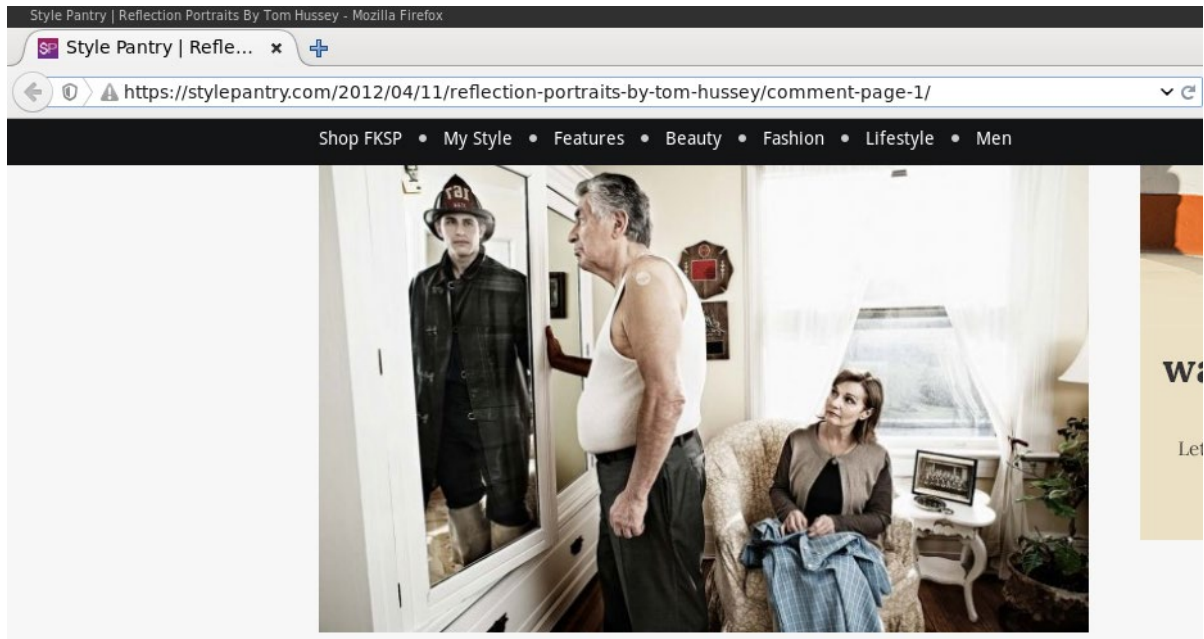
Subject Photograph G



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Screen Capture



FIRST CLAIM FOR RELIEF

(For Copyright Infringement - Against All Defendants, and Each)

29. Plaintiff repeats, realleges and incorporates herein by reference as though fully set forth the allegations contained in the preceding paragraphs of this Complaint.

30. Plaintiff is informed and believes and thereon alleges that Defendants, and each of them, had access to Subject Photograph A, Subject Photograph B, Subject Photograph C, Subject Photograph D, Subject Photograph E, Subject Photograph F, and Subject Photograph G (collectively, the “Subject Photographs”) including, without limitation, through Plaintiff’s website and social media accounts or viewing the Subject Photographs on third-party websites (e.g., Tumblr, Pinterest, etc.).

31. Plaintiff is informed and believes and thereon alleges that Defendants, and each of them, used and distributed images of the Subject Photographs, and exploited said images in multiple website posts without Plaintiff’s authorization or consent.

32. Due to Defendants’, and each of their, acts of infringement, Plaintiff has suffered damages in an amount to be established at trial.

33. Due to Defendants', and each of their, acts of copyright infringement as alleged herein, Defendants, and each of them, have obtained profits they would not otherwise have realized but for their infringement of the Subject Photographs. As such, Plaintiff is entitled to disgorgement of Defendants', and each of their, profits attributable to the infringement of the Subject Photographs in an amount to be established at trial.

34. Plaintiff is informed and believes and thereon alleges that Defendants, and each of them, have committed copyright infringement with actual or constructive knowledge of Plaintiff's rights such that said acts of copyright infringement were, and continue to be, willful, intentional and malicious.

PRAYER FOR RELIEF

Wherefore, Plaintiff prays for judgment as follows:

- a. That Defendants—each of them—and their respective agents and servants be enjoined from importing, manufacturing, distributing, offering for sale, selling or otherwise trafficking in any product that infringes Plaintiff's copyrights in the Subject Photographs;
- b. That Plaintiff be awarded all profits of Defendants, and each of them, plus all losses of Plaintiff, the exact sum to be proven at the time of trial, or, if elected before final judgment, statutory damages as available under the Copyright Act, 17 U.S.C. § 101 et seq.;
- c. That Plaintiff be awarded its attorneys' fees as available under the Copyright Act U.S.C. § 101 et seq.;
- d. That Plaintiff be awarded pre-judgment interest as allowed by law;
- e. That Plaintiff be awarded the costs of this action; and
- f. That Plaintiff be awarded such further legal and equitable relief as the Court deems proper.

1 Plaintiff demands a jury trial on all issues so triable pursuant to Fed. R. Civ. P.
2 38 and the 7th Amendment to the United States Constitution.

3 Dated: January 23, 2020

DONIGER/BURROUGHS

4
5 By: /s/ Stephen M. Doniger
6 Stephen M. Doniger, Esq.
7 Frank Gregory Casella, Esq.
8 Attorneys for Plaintiff
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UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

I. (a) PLAINTIFFS (Check box if you are representing yourself <input type="checkbox"/>) TOM HUSSEY	DEFENDANTS (Check box if you are representing yourself <input type="checkbox"/>) STYLE PANTRY, LLC, et al.
(b) County of Residence of First Listed Plaintiff _____ <i>(EXCEPT IN U.S. PLAINTIFF CASES)</i>	County of Residence of First Listed Defendant _____ <i>(IN U.S. PLAINTIFF CASES ONLY)</i>
(c) Attorneys (Firm Name, Address and Telephone Number) If you are representing yourself, provide the same information.	Attorneys (Firm Name, Address and Telephone Number) If you are representing yourself, provide the same information.

II. BASIS OF JURISDICTION (Place an X in one box only.) <input type="checkbox"/> 1. U.S. Government Plaintiff <input checked="" type="checkbox"/> 3. Federal Question (U.S. Government Not a Party) <input type="checkbox"/> 2. U.S. Government Defendant <input type="checkbox"/> 4. Diversity (Indicate Citizenship of Parties in Item III)	III. CITIZENSHIP OF PRINCIPAL PARTIES -For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant) <table border="1" style="width:100%"><tr><td></td><td>PTF</td><td>DEF</td><td></td><td>PTF</td><td>DEF</td></tr><tr><td>Citizen of This State</td><td><input type="checkbox"/> 1</td><td><input type="checkbox"/> 1</td><td>Incorporated or Principal Place of Business in this State</td><td><input type="checkbox"/> 4</td><td><input type="checkbox"/> 4</td></tr><tr><td>Citizen of Another State</td><td><input type="checkbox"/> 2</td><td><input type="checkbox"/> 2</td><td>Incorporated and Principal Place of Business in Another State</td><td><input type="checkbox"/> 5</td><td><input type="checkbox"/> 5</td></tr><tr><td>Citizen or Subject of a Foreign Country</td><td><input type="checkbox"/> 3</td><td><input type="checkbox"/> 3</td><td>Foreign Nation</td><td><input type="checkbox"/> 6</td><td><input type="checkbox"/> 6</td></tr></table>		PTF	DEF		PTF	DEF	Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
	PTF	DEF		PTF	DEF																				
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input type="checkbox"/> 4																				
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5																				
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6																				

IV. ORIGIN (Place an X in one box only.)							
<input checked="" type="checkbox"/> 1. Original Proceeding	<input type="checkbox"/> 2. Removed from State Court	<input type="checkbox"/> 3. Remanded from Appellate Court	<input type="checkbox"/> 4. Reinstated or Reopened	<input type="checkbox"/> 5. Transferred from Another District (Specify) _____	<input type="checkbox"/> 6. Multidistrict Litigation - Transfer	<input type="checkbox"/> 7. Multidistrict Litigation - Remand	<input type="checkbox"/> 8. Multidistrict Litigation - Direct File

V. REQUESTED IN COMPLAINT: JURY DEMAND: ☒ Yes ☐ No (Check "Yes" only if demanded in complaint.)

CLASS ACTION under F.R.Cv.P. 23: ☐ Yes ☒ No **MONEY DEMANDED IN COMPLAINT: \$** _____

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)
Copyright Act of 1976, Title 17 U.S.C., § 101 et seq.

VII. NATURE OF SUIT (Place an X in one box only).

OTHER STATUTES	CONTRACT	REAL PROPERTY CONT.	IMMIGRATION	PRISONER PETITIONS	PROPERTY RIGHTS
<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/Etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced & Corrupt Org. <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Admin. Procedures Act/Review of Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes	<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Vet.) <input type="checkbox"/> 153 Recovery of Overpayment of Vet. Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property TORTS PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions TORTS PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability BANKRUPTCY <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 American with Disabilities-Employment <input type="checkbox"/> 446 American with Disabilities-Other <input type="checkbox"/> 448 Education	Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee Conditions of Confinement FORFEITURE/PENALTY <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Ret. Inc. Security Act	<input checked="" type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405 (g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405 (g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609

FOR OFFICE USE ONLY:

Case Number:

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

VIII. VENUE: Your answers to the questions below will determine the division of the Court to which this case will be initially assigned. This initial assignment is subject to change, in accordance with the Court's General Orders, upon review by the Court of your Complaint or Notice of Removal.

QUESTION A: Was this case removed from state court? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "no," skip to Question B. If "yes," check the box to the right that applies, enter the corresponding division in response to Question E, below, and continue from there.	STATE CASE WAS PENDING IN THE COUNTY OF: <input type="checkbox"/> Los Angeles, Ventura, Santa Barbara, or San Luis Obispo <input type="checkbox"/> Orange <input type="checkbox"/> Riverside or San Bernardino		INITIAL DIVISION IN CACD IS: Western Southern Eastern	
QUESTION B: Is the United States, or one of its agencies or employees, a PLAINTIFF in this action? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "no," skip to Question C. If "yes," answer Question B.1, at right.	B.1. Do 50% or more of the defendants who reside in the district reside in Orange Co.? <i>check one of the boxes to the right</i> →	YES. Your case will initially be assigned to the Southern Division. <input type="checkbox"/> Enter "Southern" in response to Question E, below, and continue from there. NO. Continue to Question B.2.		
	B.2. Do 50% or more of the defendants who reside in the district reside in Riverside and/or San Bernardino Counties? (Consider the two counties together.) <i>check one of the boxes to the right</i> →	YES. Your case will initially be assigned to the Eastern Division. <input type="checkbox"/> Enter "Eastern" in response to Question E, below, and continue from there. NO. Your case will initially be assigned to the Western Division. <input type="checkbox"/> Enter "Western" in response to Question E, below, and continue from there.		
QUESTION C: Is the United States, or one of its agencies or employees, a DEFENDANT in this action? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "no," skip to Question D. If "yes," answer Question C.1, at right.	C.1. Do 50% or more of the plaintiffs who reside in the district reside in Orange Co.? <i>check one of the boxes to the right</i> →	YES. Your case will initially be assigned to the Southern Division. <input type="checkbox"/> Enter "Southern" in response to Question E, below, and continue from there. NO. Continue to Question C.2.		
	C.2. Do 50% or more of the plaintiffs who reside in the district reside in Riverside and/or San Bernardino Counties? (Consider the two counties together.) <i>check one of the boxes to the right</i> →	YES. Your case will initially be assigned to the Eastern Division. <input type="checkbox"/> Enter "Eastern" in response to Question E, below, and continue from there. NO. Your case will initially be assigned to the Western Division. <input type="checkbox"/> Enter "Western" in response to Question E, below, and continue from there.		
QUESTION D: Location of plaintiffs and defendants? Indicate the location(s) in which 50% or more of <i>plaintiffs who reside in this district</i> reside. (Check up to two boxes, or leave blank if none of these choices apply.) Indicate the location(s) in which 50% or more of <i>defendants who reside in this district</i> reside. (Check up to two boxes, or leave blank if none of these choices apply.)	A. Orange County	B. Riverside or San Bernardino County	C. Los Angeles, Ventura, Santa Barbara, or San Luis Obispo County	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
D.1. Is there at least one answer in Column A? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "yes," your case will initially be assigned to the SOUTHERN DIVISION. Enter "Southern" in response to Question E, below, and continue from there. If "no," go to question D2 to the right. →	D.2. Is there at least one answer in Column B? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "yes," your case will initially be assigned to the EASTERN DIVISION. Enter "Eastern" in response to Question E, below. If "no," your case will be assigned to the WESTERN DIVISION. Enter "Western" in response to Question E, below. ↓			
QUESTION E: Initial Division? Enter the initial division determined by Question A, B, C, or D above: →	INITIAL DIVISION IN CACD WESTERN			
QUESTION F: Northern Counties?				
Do 50% or more of plaintiffs or defendants in this district reside in Ventura, Santa Barbara, or San Luis Obispo counties? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No				

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**IX(a). IDENTICAL CASES:** Has this action been previously filed in this court?☒ NO☐ YES

If yes, list case number(s): _____

IX(b). RELATED CASES: Is this case related (as defined below) to any civil or criminal case(s) previously filed in this court?☒ NO☐ YES

If yes, list case number(s): _____

Civil cases are related when they (check all that apply):

- ☐ A. Arise from the same or a closely related transaction, happening, or event;
- ☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or
- ☐ C. For other reasons would entail substantial duplication of labor if heard by different judges.

Note: That cases may involve the same patent, trademark, or copyright is not, in itself, sufficient to deem cases related.

A civil forfeiture case and a criminal case are related when they (check all that apply):

- ☐ A. Arise from the same or a closely related transaction, happening, or event;
- ☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or
- ☐ C. Involve one or more defendants from the criminal case in common and would entail substantial duplication of labor if heard by different judges.

X. SIGNATURE OF ATTORNEY**(OR SELF-REPRESENTED LITIGANT):** /s/ Stephen M. Doniger

DATE: 01/23/2020

Notice to Counsel/Parties: The submission of this Civil Cover Sheet is required by Local Rule 3-1. This Form CV-71 and the information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. For more detailed instructions, see separate instruction sheet (CV-071A).

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405 (g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))

EXHIBIT H

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Caroline Stanley · 3rd

Editorial Strategy at Apple

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Apple



New York University

About

Data-driven editor with expertise in cross-platform storytelling and content strategy for a digital-native audience.

Experience



Head of Global Editorial Strategy, App Store

Apple

Mar 2018 – Present · 2 yrs 2 mos



Refinery29, Inc.

2 yrs 9 mos

Executive Editor

Jun 2016 – Mar 2018 · 1 yr 10 mos

Oversaw the daily operation of teams across Editorial, Branded Editorial, Photo, and Design. Partnered with R29's Chief Content Officer and Global Editor-In-Chief to conceive and execute the most cutting-edge content online, recruit new editorial talent, conceptualize franchises and special projects, and ensure that voice and tone were consistent and aligned with the company mission.

Deputy Editor, Living

Jul 2015 – Jun 2016 · 1 yr

Greater New York City Area

Managed a team of editors covering categories including travel, weddings, finance, and tech. Top edited over 300 stories per month. Grew the fledgling vertical to become R29's second-biggest traffic driver.



Managing Editor, Local Markets

Refinery29, Inc.

Aug 2014 – Mar 2015 · 8 mos

Greater New York City Area

Oversaw the restructuring of a team of remote editors in New York, Los Angeles, San Francisco, Chicago, Washington D.C., and London. Shifted the content strategy from hyperlocal coverage

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Greater New York City Area

Oversaw the restructuring of a team of remote editors in New York, Los Angeles, San Francisco, Chicago, Washington D.C., and London. Shifted the content strategy from hyperlocal coverage toward a category-based approach with wider reach and more SEO value.



Editorial Director of Bauer Teen Network

Bauer Publishing

Feb 2013 – Jul 2014 · 1 yr 6 mos

Created an online experience to complement and enhance Bauer's teen-focused print publications. Drove a 950% YoY increase in monthly pageviews for J-14, the largest of the brands, and grew its audience on Facebook to over 4.2 million fans.



Founding Editor, Flavorwire.com

Flavorpill

2008 – Feb 2013 · 5 yrs

Grew the audience for an online publisher of live event listings in major cities across the US by launching a companion pop-culture website. Hired and managed a team of writers and editors who published 20+ daily stories covering film, TV, books, art, and music.



Editorial Director

Gen Art

Jan 2007 – Oct 2008 · 1 yr 10 mos

Published daily email newsletters and oversaw copy for a company focused on promoting emerging creative talent through member-only events in markets including New York, Los Angeles, San Francisco, Chicago, and Miami.



Associate Editor (Health and Food)

Quick & Simple magazine

Jul 2005 – Jan 2007 · 1 yr 7 mos

As an associate editor, I pitched, reported, and wrote two 800-word health features per week, with a focus on weight-loss success stories and new product roundups.



Associate Editor

Twist magazine

Jul 2004 – Jun 2005 · 1 yr

During my time at Twist, one of Bauer Publishing's celebrity-focused teen titles, I covered beauty and entertainment. Each month I was responsible for producing a handful of pages, as well as securing and performing interviews with talent and shooting product samples for my stories.



Editorial Assistant

Ladies' Home Journal magazine

Jan 2003 – Jun 2004 · 1 yr 6 mos

Greater New York City Area

At Ladies' Home Journal, I generated story ideas and wrote articles for the parenting, entertaining and health sections of the magazine, while assisting the Entertainment Director and Deputy Editor with administrative tasks.

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Caroline Stanley
Editorial Strategy at Apple

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Education



New York University
Bachelor of Arts (B.A.), English and American Literature

Skills & Endorsements

Editorial · 21



Endorsed by Brian Underwood, who is highly skilled at this

Magazines · 13



Endorsed by Bill Lieberman and 1 other who is highly skilled at this



Endorsed by 4 of Caroline's colleagues at Gen Art

Blogging · 12



Endorsed by 5 of Caroline's colleagues at Gen Art

Industry Knowledge

Content Strategy · 9

Social Media · 6

Copy Editing · 6

Film · 5

Newsletters · 5

Writing · 5

Journalism · 4

Entertainment · 4

Digital Strategy · 4

SEO · 4

Copywriting · 4

Creative Direction · 3

Branding & Identity · 2

Publishing · 2

Digital Media · 2

Editing · 2

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The Online MBA Program from Pepperdine. GMAT Waivers Available

Recommendations

Received (1)

Given (1)



Lee Sawa-Frank
Project Manager / eCommerce Manager
April 14, 2014, Lee reported directly to Caroline

Caroline was a great manager to work with. She had a positive attitude and guided me through developing the social media voice of Flavorpill. She was able to skillfully manage a team of in-house writers, freelancers and interns to craft the blogging voice of the company. Soon after I started, Flavorwire was contributing a lionshare of web traffic. [See less](#)

Interests



Refinery29, Inc.
160,054 followers



New York University
612,255 followers



Rachel Sklar
Founder, TheLi.st
107,965 followers



Bauer Media Group - USA
6,775 followers



Philippe von Borries
Founder of Refinery29
161,996 followers



Anil Dash
CEO of Glitch
81,908 followers

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Recommendations

Received (1)

Given (1)

**Lee Sawa-Frank**Project Manager /
eCommerce ManagerApril 14, 2014, Lee reported
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**Refinery29, Inc.**

160,054 followers

**New York University**

612,255 followers

**Rachel Sklar** inFounder, TheList
107,965 followers**Bauer Media Group - USA**

6,775 followers

**Philippe von Borries** inFounder of Refinery29
161,996 followers**Anil Dash** inCEO of Glitch
81,908 followers

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English (English)

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EXHIBIT I

NYS Department of State

Division of Corporations

Entity Information

The information contained in this database is current through April 24, 2020.

Selected Entity Name: FLAVORPILL PRODUCTIONS LLC

Selected Entity Status Information

Current Entity Name: FLAVORPILL PRODUCTIONS LLC

DOS ID #: 2662524

Initial DOS Filing Date: JULY 20, 2001

County: NEW YORK

Jurisdiction: NEW YORK

Entity Type: DOMESTIC LIMITED LIABILITY COMPANY

Current Entity Status: ACTIVE

Selected Entity Address Information

DOS Process (Address to which DOS will mail process if accepted on behalf of the entity)

FLAVORPILL PRODUCTIONS LLC

594 BROADWAY

SUITE 1212

NEW YORK, NEW YORK, 10012

Registered Agent

NONE

This office does not require or maintain information regarding the names and addresses of members or managers of nonprofessional limited liability companies. Professional limited liability companies must include the name(s) and address(es) of the original members, however this information is not recorded and only available by [viewing the certificate](#).

***Stock Information**

# of Shares	Type of Stock	\$ Value per Share
-------------	---------------	--------------------

No Information Available

*Stock information is applicable to domestic business corporations.

Name History

Filing Date	Name Type	Entity Name
JUL 20, 2001	Actual	FLAVORPILL PRODUCTIONS LLC

A **Fictitious** name must be used when the **Actual** name of a foreign entity is unavailable for use in New York State. The entity must use the fictitious name when conducting its activities or business in New York State.

NOTE: New York State does not issue organizational identification numbers.

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Mark Mangan · 3rd

Company Creator, Advisor, Consultant

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Flavorpill



University of Vermont

About

I'm mostly recently cofounder of Flavorpill Media, a leading publisher of cultural content and events, where I was CEO and then headed up our innovation lab. I'm currently working on a couple projects in stealth mode and advising early stage companies.

Experience



Co-founder

Flavorpill

Oct 2000 – Aug 2018 · 17 yrs 11 mos

Greater New York City Area

Flavorpill Media is a creator of cultural content and events. Through our two sites and Flavorpill and Flavorwire, we cover art, film, music, etc. and provide not only picks, the best things to do with your free time, both nationally and locally (Flavorpill), and also cultural news and commentary (Flavorwire). On the events side, we have hosted everything from DJ events at the Guggenheim and Getty to yoga on the Great Lawn for ten thousand people. Working with the best brands in the world, we help them reach an audience of smart, discerning readers and event goers in the most dynamic cities in the US. As of August 2018, we are now a part of Bustle Digital Group.



Co-founder, CEO

Netsetgoods

1998 – 2000 · 2 yrs

Greater New York City Area

Netset curated design-based products from around the world, including accessories, home design, and music. The company was featured in every major style magazine and sold to all 50 states and 15 countries. We did virtually everything in house - from inventory management and shipping to product sourcing and site development (including a raw implementation of ecommerce way back in the last century). After the first dot-com crash we sold off parts and a couple of us looked for the next invention, one with less overhead and more about connecting content and people.

[see less](#)

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1996 – 1998 · 2 yrs

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People Also Viewed



Jessie Balfour-Lynn · 3rd

Co-founder of Le Ciel Foundation- Community and Events Associate at Ashoka



Tjaden Hess · 3rd+

CS+Mathematics Major Cornell University



Sarah Drew · 3rd

Impact Programs Manager at The James Beard Foundation



Sascha Lewis · 2nd

Founder, Future Present, EVERYMAN & Flavorpill Media, Consultant, Advisor



Sarah Drew · 3rd

Author of GAIA CODEX - Speaker.Teacher.Visionary Media



Jake Sherman · 3rd

Director, Brian Urquhart Center for Peace Operations at International Peace Institute (IPI)



Richard Chriss · 3rd

CEO of America's leading organization representing the steel supply chain Harvard Catholic University



Evgeni Mitkov · 3rd

Blockchain and FX Expert



Nate Lombardi · 3rd

Creative Executive who cultivates empathetic citizens through gaming/arts. NEXUS Global, Summit Series, Board



Messaging



**Mark Mangan**

Company Creator, Advisor, Consultant

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agency.com

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Agency.com

1996 – 1998 · 2 yrs

New York City

Hired to do site building and production, I soon after moved into site editing then business development, concepting and creating videos to win business for big companies like Kmart and British Airways. Then I got into information architecture and before I left I created and ran a new org within the company for the president and one of the founders called the Applied Concepts Lab, which was focused on usability and new testing technologies.

[see less](#)

PENCOM

Corporate Writer + Web Guy

Pencom Systems

1995 – 1998 · 3 yrs

I was hired by the #2, VP of Operations and General Counsel, to be his go-to person as he, sensing the imminent explosion of the web, was looking to expand the software development aspects of the company, which was at the time primarily a recruiting firm. I helped create and launch the Pencom site, including a popular "salary survey" application which generated thousands of qualified leads every quarter. I also wrote the treatment for an early book on Java called Java Programming Basics, for which I wrote the forward, when the language was still in its alpha.

[see less](#)**Education****University of Vermont**

English, Philosophy, French

1989 – 1993

Activities and Societies: Phi Beta Kappa

**Université Paris Sorbonne (Paris IV)**

Literature, Philosophy, Art

1991 – 1992

Volunteer Experience**Board Member**

Housing Works Bookstore

2009 – Present · 11 yrs

Health

Housing Works Bookstore is a cultural center on Crosby Street in Soho, a flagship for Housing Works, the \$50M organization dedicated to housing for people with AIDS. The bookstore regularly host big acts including such performers as Bjork or Lou Reed.

Skills & Endorsements

Editorial · 55



Endorsed by Courtney Boyd Myers (CBM) and 1 other who is highly skilled at this



Endorsed by 2 of Mark's colleagues at Flavorpill Media

E-commerce · 50

Global, Summit Series, Board Member

**Sandy Nelson · 3rd**

Sales Controller for LMG, WKL&B

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**Mark Mangan**

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Other who is highly skilled at this

Media

E-commerce · 50

Endorsed by phil terry, who is highly skilled at this

Content Strategy · 50

Endorsed by Zolton Zavos and 2 others who are highly skilled at this



Endorsed by 2 of Mark's colleagues at Flavorpill Media

Industry Knowledge

Digital Media · 48**Editing** · 32**Digital Strategy** · 31**Social Media** · 25**Publishing** · 23**Digital Marketing** · 15**Social Media Marketing** · 14**Entrepreneurship** · 14**Online Marketing** · 13**User Experience** · 13**Newsletters** · 11**Blogging** · 9**Product Development** · 8**Creative Direction** · 8**Integrated Marketing** · 8**Online Advertising** · 7**Content Management** · 6**SEO** · 6**Creative Writing** · 5**Writing** · 4**Video** · 4**Fashion** · 3**Business Intelligence** · 2**Magazines** · 2**Brand Development** · 2**Information Architecture** · 2**Brand Management** · 1**Search Engine Optimization (SEO)** · 1

Tools & Technologies

Wordpress · 2**WordPress** · 2

Other Skills ?

New Media · 35**Organizational Culture** · 2**Mastering** · 2**Online News** · 1**Production** · 1

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Messaging



**Mark Mangan**

Company Creator, Advisor, Consultant

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Recommendations

[Received \(2\)](#)[Given \(2\)](#)**Preston Pesek**CoFounder & CEO at
Spacious (acquired by
WeWork)August 15, 2018, Preston was a
client of Mark's

Mark is an absolute pleasure to work with. We engaged with him in our earliest days to help Spacious frame and articulate our internal Mission, Vision, Values, and Purpose. He coached us to draw out our best ideas, and was a huge help in aligning the team around our reasons for being. I highly recommend.

**Brian S. Gross**Founder, BSG Public
RelationsApril 18, 2012, Brian S. worked
with Mark but at different
companies

One of my favorite parts of the morning is to find the daily Flavorpill email in my inbox. Always a wonderful way to start the day.

Accomplishments

2 Languages

English • French

2 Projects

Advisor for Spacious • Advisor for Of A Kind

1 Publication

Sex, Laws and Cyberspace: Freedom and Censorship on the Frontiers of the Online Revolution

Interests

**Harvard Business Review**

10,200,785 followers

**Simon Sinek**Optimist and Author at Simon Sinek Inc.
2,717,931 followers**The New York Times**

4,542,630 followers

**Gary Vaynerchuk**Chairman of VaynerX, CEO of VaynerMedi...
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17,120,240 followers**Amazon**

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CoFounder & CEO at
Spacious (acquired by
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August 15, 2018, Preston was a
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Accomplishments

2

Languages

English • French



2

Projects

Advisor for Spacious • Advisor for Of A Kind



1

Publication

Sex, Laws and Cyberspace: Freedom and Censorship on the Frontiers of the Online Revolution



Interests

**Harvard Business Review**

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**Messaging**

EXHIBIT K

U.S. District Court — Judicial Caseload Profile

NEW YORK SOUTHERN

NEW YORK SOUTHERN			12-Month Periods Ending						Numerical Standing Within			
			Dec 31 2014	Dec 31 2015	Dec 31 2016	Dec 31 2017	Dec 31 2018	Dec 31 2019				
Overall Caseload Statistics	Filings ¹		13,359	12,490	12,983	12,721	15,104	14,490	U.S.	Circuit		
	Terminations		13,375	13,196	13,772	12,179	13,094	14,971				
	Pending		18,706	17,972	17,191	17,255	19,239	18,685				
	Percent Change in Total Filings Current Year Over Earlier Year		8.5	16.0	11.6	13.9	-4.1					
Number of Judgeships			28	28	28	28	28	28	74	6		
Vacant Judgeship Months ²			0.0	5.0	12.0	26.9	52.3	72.0				
Actions per Judgeship	Filings	Total	477	446	464	454	539	518			42	3
		Civil	411	380	374	379	457	442			23	3
		Criminal Felony	44	46	58	49	53	48	86	5		
		Supervised Release Hearings	23	20	32	27	30	28	60	6		
	Pending Cases ²		668	642	614	616	687	667	22	3		
	Weighted Filings ²		432	458	463	467	575	582	23	2		
	Terminations		478	471	492	435	468	535	34	3		
	Trials Completed		14	14	15	15	15	14	57	2		
	Median Time (Months)	From Filing to Disposition	Criminal Felony	15.4	16.2	13.1	14.0	14.0	14.7	84	5	
Civil ²			9.0	8.3	9.1	7.0	6.0	6.5	12	1		
From Filing to Trial ² (Civil Only)		31.4	25.3	28.3	29.4	33.0	31.1	37	1			
Other	Number (and %) of Civil Cases Over 3 Years Old ²		3,202 22.9	2,452 18.2	2,244 18.2	2,379 19.1	2,664 18.6	2,927 20.9	86	6		
	Average Number of Felony Defendants Filed per Case		1.7	1.7	2.1	2.0	1.9	1.7				
	Jurors	Avg. Present for Jury Selection	85.9	68.6	69.0	72.5	75.8	85.6				
		Percent Not Selected or Challenged	56.6	52.1	52.5	48.9	52.8	59.0				

2019 Civil Case and Criminal Felony Defendant Filings by Nature of Suit and Offense

Type of	Total	A	B	C	D	E	F	G	H	I	J	K	L
Civil	12,384	551	428	1,073	24	82	1,142	1,138	931	1,268	3,855	53	1,839
Criminal ¹	1,327	3	533	54	140	383	61	39	4	11	24	16	59

NOTE: Criminal data in this profile count defendants rather than cases and therefore will not match previously published numbers.

¹ Filings in the "Overall Caseload Statistics" section include criminal transfers, while filings by "Nature of Offense" do not.² See "Explanation of Selected Terms."

U.S. District Court — Judicial Caseload Profile

DELAWARE

DELAWARE			12-Month Periods Ending						Numerical Standing Within			
			Dec 31 2014	Dec 31 2015	Dec 31 2016	Dec 31 2017	Dec 31 2018	Dec 31 2019				
Overall Caseload Statistics	Filings ¹		1,809	1,450	1,562	2,080	2,259	2,619	U.S.	Circuit		
	Terminations		2,231	1,920	1,428	1,982	2,050	2,434				
	Pending		2,403	1,935	2,071	2,168	2,383	2,582				
	Percent Change in Total Filings Current Year Over Earlier Year		44.8	80.6	67.7	25.9	15.9					
Number of Judgeships			4	4	4	4	4	4	15	3		
Vacant Judgeship Months ²			0.0	0.0	0.0	18.9	19.0	0.0				
Actions per Judgeship	Filings	Total	452	363	391	520	565	655			20	2
		Civil	428	338	361	493	537	616			8	2
		Criminal Felony	18	18	23	23	23	32			91	6
		Supervised Release Hearings	6	7	7	4	5	7			89	5
	Pending Cases ²		601	484	518	542	596	646			23	3
	Weighted Filings ²		785	541	505	810	951	1,115			3	1
	Terminations		558	480	357	496	513	609			22	2
	Trials Completed		21	15	15	16	13	21			32	3
Median Time (Months)	From Filing to Disposition	Criminal Felony	10.8	14.7	10.5	13.0	10.5	7.8			22	1
		Civil ²	10.9	12.6	9.2	6.0	5.5	5.3			5	1
	From Filing to Trial ² (Civil Only)		29.2	27.7	24.5	27.1	28.7	30.9			35	2
Other	Number (and %) of Civil Cases Over 3 Years Old ²		288 12.9	205 11.5	268 14.1	200 10.0	211 9.6	232 9.6	55	3		
	Average Number of Felony Defendants Filed per Case		1.5	1.8	1.3	1.2	1.1	1.0				
	Jurors	Avg. Present for Jury Selection	42.4	64.1	55.0	59.6	70.6	43.5				
		Percent Not Selected or Challenged	28.0	46.6	37.4	40.1	38.6	26.2				

2019 Civil Case and Criminal Felony Defendant Filings by Nature of Suit and Offense

Type of	Total	A	B	C	D	E	F	G	H	I	J	K	L
Civil	2,464	25	61	163	2	2	19	151	48	1,054	102	10	827
Criminal ¹	127	1	34	45	18	8	3	4	-	2	9	-	3

NOTE: Criminal data in this profile count defendants rather than cases and therefore will not match previously published numbers.

¹ Filings in the "Overall Caseload Statistics" section include criminal transfers, while filings by "Nature of Offense" do not.² See "Explanation of Selected Terms."

EXHIBIT L

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NEW YORK (BROADWAY)

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Duane Morris' New York (Broadway) location provides a diverse range of services to domestic and international clients ranging from large multinational corporations to closely held entrepreneurial businesses. The firm maintains one of its largest contingents of attorneys in New York to better serve its clients operating within the many global industries (including financial services and insurance) that conduct business in the world's financial center. In February 2020, Duane Morris combined with Satterlee Stephens LLP, giving the firm a [Park Avenue location](#), further strengthening its already robust NYC presence on Broadway.

Range of Services

Corporate, Securities, Mergers and Acquisitions

Members of the Corporate Practice Group advise clients in connection with mergers and acquisitions, public and private offerings of equity and debt securities, corporate finance, corporate compliance, corporate governance and taxation. The attorneys have experience in negotiated acquisitions and divestitures, and defense against takeover attempts. Duane Morris lawyers regularly represent international clients in both domestic and cross-border transactions. The firm has experience with venture capital and private equity transactions, and works with many clients in developing and implementing creative strategies to accomplish their corporate finance and acquisition objectives.

Duane Morris also represents clients in a wide range of securities matters, including public offerings of debt or equity securities, as well as private offerings ranging from start-up financings and bridge offerings prior to initial public offerings to major placements of private limited partnerships or limited liability companies. The firm's attorneys represent clients in a myriad of securities offerings and regularly advise public companies on compliance with ongoing reporting obligations and other securities laws, including Sarbanes-Oxley Act compliance.

Business Reorganization and Financial Restructuring

Lawyers in the Business Reorganization and Financial Restructuring Practice Group work in tandem with each client, whether lender or other creditor, debtor, trustee or creditors' committee, to determine the best strategy for deriving maximum value from a troubled entity while simultaneously seeking to meet each client's goals. Clients draw on the firm's extensive reorganization experience as one of the most active bankruptcy practices in the United States with a national team of dozens of Duane Morris bankruptcy lawyers in numerous jurisdictions.

Complex Litigation and Alternative Dispute Resolution

Lawyers in Duane Morris' Trial Practice Group represent clients in all types of complex commercial litigation, from inception through trial and appeal. Duane Morris litigators are experienced in an array of areas, including securities, antitrust, intellectual property, environmental and real estate disputes. Members of the Trial Practice Group work closely with the firm's corporate and bankruptcy lawyers and often represent financial institutions. The firm's attorneys have represented numerous

NEW YORK (BROADWAY)

Duane Morris LLP
1540 Broadway
New York, NY 10036-4086
USA

Phone: +1 212 692 1000

Fax: +1 212 692 1020

[Map & Directions](#)

*Building entrance on 45th Street,
just east of Times Square.*

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Lawyers in Duane Morris' Trial Practice Group represent clients in all types of complex commercial litigation, from inception through trial and appeal. Duane Morris litigators are experienced in an array of areas, including securities, antitrust, intellectual property, environmental and real estate disputes. Members of the Trial Practice Group work closely with the firm's corporate and bankruptcy lawyers and often represent financial institutions. The firm's attorneys have represented numerous international and national manufacturers in all forms of products liability and toxic tort litigation, including defense of product class actions, serving as national coordinating counsel, lead counsel, regional counsel or local counsel. Duane Morris also represents both individuals and corporations facing federal and state allegations of criminal conduct, including fraud, environmental crimes, securities violations, RICO violations, trade espionage and a variety of business-related offenses. In addition to representing clients in U.S. forums and before international tribunals, the firm also provides counsel on settling disputes without conventional litigation by using alternative dispute resolution and advises on methods to anticipate and avoid litigation.

Financial Markets

The New York office of Duane Morris is the national headquarters of the firm's Financial Markets practice, a combination of the Trial and Corporate attorneys who represent securities, futures and derivatives firms, capital markets, institutional lenders, commercial lenders, clearing firms and individual professionals in these industries including broker-dealers, futures commission merchants, investment advisers, portfolio managers, commodity pool operators and advisors, and floor traders. Duane Morris provides start-up services, assisting clients in registration and formation. The firm also counsels clients regarding regulatory compliance and enforcement, managed investment programs and products offerings, criminal investigations and related arbitration and litigation, and strategic business planning. Duane Morris attorneys focus on problem prevention, including comprehensive reviews of clients' existing policies and procedures, and regulatory-style examinations to detect inappropriate practices and help clients prepare for compliance audits.

Intellectual Property and IP Litigation

Duane Morris' intellectual property (IP) lawyers recognize the importance of clients' intellectual capital to the success of their businesses and understand how to uphold IP rights to increase opportunities for clients to enhance market share. Members of the firm's IP practice have played pivotal roles in the development of IP law and their ranks include highly trained patent attorneys with backgrounds in biosciences, materials, chemicals, polymers, electronics and telecommunications. Their experience includes trademarks and copyrights, patents, licensing agreements and brand protection, domestic and international.

Duane Morris lawyers have substantial experience across the U.S. in all areas of IP litigation, including jury trial experience on behalf of IP owners and accused infringers in patent, trademark, trade dress, copyright and trade secret cases. The firm's IP attorneys have also represented clients in mediation, arbitration, inter partes proceedings before the U.S. Patent and Trademark Office, and before appellate courts concerning IP matters.

White-Collar Criminal Litigation

Duane Morris counsels both individuals and corporations facing federal and state allegations of criminal conduct. The firm's lawyers advise clients accused of Medicare/Medicaid fraud and abuse, environmental crimes, securities violations, criminal tax fraud, fraud in government procurement, RICO violations, trade espionage and a variety of business-related offenses. Duane Morris attorneys also have extensive experience leading internal investigations.

Public, Project and Structured Finance

Duane Morris attorneys represent clients in numerous types of transactions covering nearly every aspect of municipal, project and structured finance transactions. The firm's lawyers have extensive experience with financings involving corporations and financial institutions on a regional, national and international level. Duane Morris public finance attorneys represent national and regional investment banking firms underwriting tax-exempt and taxable state and local government debt, act as bond counsel and special tax counsel for issuers and represent domestic and foreign institutions providing credit enhancement for tax-exempt financing. The firm's project and structured finance attorneys represent clients in securitized and syndicated loans,





financial institutions on a regional, national and international level. Duane Morris public finance attorneys represent national and regional investment banking firms underwriting tax-exempt and taxable state and local government debt, act as bond counsel and special tax counsel for issuers and represent domestic and foreign institutions providing credit enhancement for tax-exempt financing. The firm's project and structured finance attorneys represent clients in securitized and syndicated loans, participating and convertible loans, mezzanine and other hybrid loans and credit lease, synthetic lease and government lease financings.

Real Estate

Duane Morris' real estate attorneys represent a broad range of high-profile institutional and individual clients in all aspects of real estate transactions and related matters. The Real Estate Practice Group handles real estate acquisitions and dispositions, financings, workouts and restructurings, development and leasing, land use and zoning issues.

Construction Group

Duane Morris' Construction Group has extensive experience in handling both transaction and litigation issues that arise in the design, development, financing, performance, management and close-out of major private, public and public-private partnership construction projects. The firm's representations include public and private owners and developers, construction managers, prime contractors, subcontractors, equipment suppliers, architects, engineers and other design professionals as well as sureties on a multitude of project segments (industrial, utility, energy, commercial and green building/sustainable projects) and a wide range of delivery systems (design-bid-build, design-build, CM and PPP) and on emerging technologies, such as BIM.

Insurance and Reinsurance Law

Industry publications have recognized Duane Morris as having one of the top Insurance practices in the United States. Attorneys in the Insurance and Reinsurance Practice Group have been engaged in representations of insurance industry interests for many years, having served as counsel to numerous property/casualty insurance companies, life insurance companies, reinsurance companies, HMOs and PPOs, rating bureaus, captive insurers offshore, and alternative market entities and guaranty associations. The firm has also represented underwriters of public offerings of insurance securities.

Duane Morris' background in the industry contributes to the firm's ability to address client concerns effectively. Duane Morris attorneys have an in-depth understanding of actuarial, underwriting and policy coverage matters affecting the business and legal issues of insurance industry clients. The firm has handled matters affecting financial examinations, market conduct examinations and other regulatory issues as well as general corporate matters.

International

Duane Morris' International Practice Group integrates the services of attorneys from various disciplines who practice around the world, creating a global infrastructure of not only international experience, but also enhanced sensitivity to cultural differences. In the area of international trade regulation, the firm provides advice regarding domestic and international regulatory and commercial aspects of trade in goods and services, including product labeling and other domestic and foreign regulations that affect imports and exports. The firm's lawyers regularly counsel companies with international operations in a wide variety of cross-border transactional matters and represent clients from all over the world with business and investment interests around the globe.

Employment Law and Management Labor Relations

Duane Morris' lawyers represent employers of all sizes in a broad spectrum of labor and employment matters, including equal employment opportunity compliance and litigation, statutory compliance and litigation defense and employment termination. The firm's attorneys provide a full range of labor relations services, representing clients in union-organizing campaigns, proceedings before the National Labor Relations Board, negotiations of labor contracts and disputes over labor contract provisions. The group assists employers in protecting their proprietary information and in enforcing noncompetition and nonsolicitation agreements. Duane Morris lawyers emphasize policies to prevent employment problems through problem





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Energy, Environment and Resources

Duane Morris energy attorneys assist clients with advisory, regulatory, litigation and legislative matters involving water, natural resources, energy and environmental issues. These attorneys are frequently called upon to counsel clients with respect to their interactions with federal, state and municipal authorities as well as with industry participants. To better focus the firm's energy industry experience, the firm has established national groups concentrating on Nuclear as well as Renewable Energy and Sustainability. The groups include lawyers throughout the country in a cross-cutting team with the ability to represent the firm's clients from the inception of a project, including intellectual property; in the permitting stage, often by addressing construction claims; and in later stages regarding matters of a corporate nature. Our attorneys have been involved in multibillion-dollar transactions and successfully litigated significant cases before agencies and courts on complex regulatory issues. Representative transactions include mergers and acquisitions, capital market transactions, international joint ventures, real estate and environmental issues, project finance and both secured and unsecured lending arrangements.

Health Law

In one of the most regulated industries in the United States, Duane Morris' healthcare attorneys provide innovative solutions to assist healthcare providers in protecting their assets and increasing their overall profitability while remaining compliant with federal and state laws and regulations. The firm's healthcare clients benefit from one of the most experienced healthcare practice groups in the country. Duane Morris advises a wide range of healthcare organizations, hospitals and clinical professionals in regulatory and corporate matters, contract and commercial litigation, labor and employment, real estate, compliance, managed care, credentialing, reimbursement and taxation issues. When the uncertainty that characterizes the healthcare system spills over into legal disputes, Duane Morris lawyers represent clients in courts, arbitration and mediation sessions, and administrative proceedings.

Information Technology and Telecommunications

Duane Morris has assembled a dedicated group of attorneys possessing specific industry knowledge and interdisciplinary skills to address the transactional, finance, regulatory and dispute resolution aspects of structuring and implementing a wide range of information technologies and telecommunications projects.

Private Client Services

Duane Morris' Private Client Services Practice Group represents a broad range of closely held business owners and other high net worth individuals with respect to their personal and professional planning. The firm provides estates, trusts, asset planning and related litigation services to individuals, business owners, charitable organizations and fiduciaries. The Private Client Services attorneys have significant experience in the settlement of decedents' estates, fiduciary income tax matters, administration of trusts and counseling on family matters. Throughout each relationship with clients, Duane Morris attorneys work to minimize tax exposure and implement creative strategies to preserve capital and transfer resources within the client's family and to next generations. The firm also provides all aspects of fiduciary litigation services related to probate, trust and guardianship administration.

Tax

Members of the Duane Morris Tax Practice Group are an integral part of the firm's transactional practice. Tax attorneys work closely with the firm's corporate and finance lawyers to structure and effectuate complex transactions from a tax perspective. Duane Morris represent business enterprises operating as corporations, partnerships or limited liability companies, advising both foreign-owned and U.S.-based multinationals on international and domestic acquisitions and reorganizations, as well as





In one of the most regulated industries in the United States, Duane Morris' healthcare attorneys provide innovative solutions to assist healthcare providers in protecting their assets and increasing their overall profitability while remaining compliant with federal and state laws and regulations. The firm's healthcare clients benefit from one of the most experienced healthcare practice groups in the country. Duane Morris advises a wide range of healthcare organizations, hospitals and clinical professionals in regulatory and corporate matters, contract and commercial litigation, labor and employment, real estate, compliance, managed care, credentialing, reimbursement and taxation issues. When the uncertainty that characterizes the healthcare system spills over into legal disputes, Duane Morris lawyers represent clients in courts, arbitration and mediation sessions, and administrative proceedings.

Information Technology and Telecommunications

Duane Morris has assembled a dedicated group of attorneys possessing specific industry knowledge and interdisciplinary skills to address the transactional, finance, regulatory and dispute resolution aspects of structuring and implementing a wide range of information technologies and telecommunications projects.

Private Client Services

Duane Morris' Private Client Services Practice Group represents a broad range of closely held business owners and other high net worth individuals with respect to their personal and professional planning. The firm provides estates, trusts, asset planning and related litigation services to individuals, business owners, charitable organizations and fiduciaries. The Private Client Services attorneys have significant experience in the settlement of decedents' estates, fiduciary income tax matters, administration of trusts and counseling on family matters. Throughout each relationship with clients, Duane Morris attorneys work to minimize tax exposure and implement creative strategies to preserve capital and transfer resources within the client's family and to next generations. The firm also provides all aspects of fiduciary litigation services related to probate, trust and guardianship administration.

Tax

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For More Information

For more information, please contact [Michael D. Grohman](#), [James J. Coster](#) or any of the lawyers referenced in the [Attorney Listing](#).



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